

Response dated 10/31/2005  
Response to Office Action mailed 06/30/2005

Application No. 09/931,545

### REMARKS

In the current Office Action, claims 1, 2, 6, and 9-15 are pending. Claims 1, 2, 6 and 9-15 stand rejected. In the current response, claims 6 and 10 have been amended. No new matter has been introduced into the application. As explained in more detail below, Applicants respectfully submit that all claims are in condition for allowance.

#### Rejection under 35 USC §112

*Claim 10 is rejected under 35 USC §112, first paragraph, for failing to comply with the written description requirement.*

Applicants have amended claim 10 in order to advance prosecution of the application. The claim 10 feature of "updating stored identifying information of said device in said plugable server module" has been removed from claim 10 rendering the rejection moot. Applicants respectfully submit the claim 10 is now in condition for allowance.

#### Rejection under 35 USC §102

*Claim 1 is rejected under 35 USC §102(b) as being anticipated by Pennerath, et al., EP 1069694 A1.*

Applicants have reviewed the 35 USC §102(b) rejection and respectfully submit that the current 35 USC §102(b) rejection is improper in that Applicant's filing date for the current application is August 24, 2001; whereas, the publication date of the Pennerath patent is January 1, 2001. Therefore, Applicants respectfully submit that a 35 USC §102(b) rejection is improper and request withdrawal of the rejection.

Moreover, Applicants submit that for the following additional reasons, independent claim 1 is allowable over Pennerath. Applicants respectfully submit that Pennerath does not disclose, teach, or suggest at least the claimed features of "a standardized interface and a connector for connecting to said device. . ." and "said server remote control logic is connected to said standardized interface and said connector . . . ."

Support for Applicants claimed features may be found in at least Paragraph [007] which states:

Response dated 10/31/2005  
Response to Office Action mailed 06/30/2005

Application No. 09/931,545

... Standardized in this respect means that the interface works in accordance with a globally or regionally accepted standard or even according to a manufacturer's specific standard.

Additional, support for Applicant's claimed feature of "a standardized interface and a connector" may also be found in at least Paragraph [0026] which states:

A device 11 comprises a conventional device logic 7 for conventional inputs. The device logic 7 is connected to a device remote control logic 6 adapting the standard interface and connector (SIAD) 5 to the device logic. In the SIAD 5 a pluggable server module (PSM) 10 is inserted. The SIAD provides an electrical (or optical) and mechanical contact between the PSM and the device. In the PSM the server remote control 4 adapts the standard interface connector 5 to the computing means 3, telemetrically (optically) and logically. . . .

In contrast, Pennerath merely discloses wired connections (7) coupled between first and second devices and a controller (5). (See; Paragraph [0030] and Figure 1). Pennerath does not disclose, teach, or suggest a standardized interface and a connector for connecting to said device. In aspects of the currently claimed invention, the pluggable server modules are inserted into the device to be controlled via the inserted pluggable server module. The standardized interface and connector provides a pluggable electro-mechanical interface for inserting a pluggable server into the device to be controlled. The wired connections (7) of Pennerath do not disclose the standardized interface and connector of Applicant's claimed invention. Therefore, for at least this additional reason, Applicants respectfully submit that independent claim 1 is in condition for allowance. Claims 2 and 12-15 contain at least the same claimed features of claim 1 and are allowable for at least the same reason as independent claim 1.

*Claims 1-2 and 14-15 are rejected under 35 USC §102(e) as being anticipated by Hollstrom, et al., U.S. Publication No. 2001/0056502.*

Hollstrom describes a server device which has a programmable controller, a memory coupled to said controller, and a server program stored in the memory and executable by the controller. The server program is adapted to communicate with a client program in the portable telecommunication apparatus through a first interface. The server program is adapted to communicate with an electronic utility device through a second interface. The program is adapted so that digital information can be transferred between the portable telecommunication apparatus and the electronic utility device.

Response dated 10/31/2005  
Response to Office Action mailed 06/30/2005

Application No. 09/931,545

Similar to Pennerath, Hollstrom does not disclose, teach, or suggest, a standardized interface and a connector for connecting to said device. In aspects of the currently claimed invention, the pluggable server modules are inserted into the device to be controlled via the inserted pluggable server module. The standardized interface and connector provides a pluggable electro-mechanical interface for inserting a pluggable server into the device to be controlled.

The connections between the devices and server module in Hollstrom are made through use of a serial cable, (See Paragraph [0030]), and not through use of a standardized interface and connector of Applicant's claimed invention. Therefore, for at least this additional reason, Applicants respectfully submit that independent claim 1 is in condition for allowance. Claims 2 and 12-15 contain at least the same claimed feature of claim 1 are allowable for at least the same reason as claim independent 1.

*Claims 9-10, 12 and 13 are rejected under 35 USC §102(e) as being anticipated by Rezvani, U.S. Publication No. 2003/0140107.*

Rezvani discloses a method for virtually representing and controlling remote device. In Rezvani, a web server 46 and a database server 48 are located at a remote site from the controlled device. The web server generates both static and dynamic web pages from data supplied from the database server. The generated web pages are displayed to a user via an Internet browser running on a client device.

Applicant's claimed invention provides a method and a device capable to operate an electronic device (utility device) from a remote location. In an aspect of the invention, the utility device need not provide for a user interface. Therefore, the user device or the interface for the pluggable server can be implemented in a very simple way. Provided that the device to be controlled comprises a control logic, the server needs only to access this control logic. The user interface resides within the server, preferably in the form of a stored software application, wherein the design and the language of the user interface can be adapted by a simple software update of the server device.

Rezvani does not disclose, teach, or suggest at least the claimed features of "detecting a pluggable server module connected to a standardized interface and a connector of said device . . ." and "transferring the user interface data to said pluggable server module via said standardized interface and said connector." Rezvani merely discloses a non-pluggable web server which is

Response dated 10/31/2005  
Response to Office Action mailed 06/30/2005

Application No. 09/93: 545

located at a remote site and can not be inserted into the utility device. In addition, Rezvani only discloses detecting a new device such as a camera or light switch (See Paragraph [0061] and Figure 3) and does not disclose, teach, or suggest Applicant's claimed feature of a "detecting a pluggable server module." Applicants respectfully submit that in accordance with Applicant invention a user interface such as a device specific user interface (DSUI) is stored in a pluggable server, which is in stark contrast to the disclosure in Rezvani. Therefore, for at least these reasons Applicants respectfully submit that independent claim 9 is in condition for allowance. Claim 10 also contains the claimed feature of a "pluggable server module" and is allowable for at least the same reasons as discussed regarding independent claim 9. Dependent claim 11-13 which ultimately depend from one of independent claims 9-10 are allowable for at least the same reasons as the independent claim from which they ultimately depend.

#### **Rejection under 35 USC §103**

*Claims 6, 12 and 13 are rejected under 35 USC §102(e) as being anticipated by Hollstrom, U.S. Publication No. 2001/0056502 in view of Rezvani, et al., U.S. Publication No. 2003/0140107.*

Applicant believes that above rejection regarding claims 6, 12, and 13 is a rejection under 35 USC §103(a) and not a rejection under 35 USC §102(e) as stated in the Final Office Action.

Neither Hollstrom nor Rezvani disclose, teach, or suggest the claimed feature of "a pluggable server connected to said device via a standardized interface and a connector."

With regard to Hollstrom, Hollstrom does not disclose, teach, or suggest a standardized interface and a connector for connecting to said device. In aspects of the currently claimed invention, the pluggable server modules are inserted into the device to be controlled via the inserted pluggable server module. The standardized interface and connector provides a pluggable electro-mechanical interface for inserting a pluggable server into the device to be controlled. The connections between the devices and server module in Hollstrom are made through use of a serial cable, (See Paragraph [0030]), and not through use of a standardized interface and connector such as disclosed in Applicant's claimed invention.

In addition, Rezvani also does not disclose the claimed feature of "a pluggable server connected to a said device via a standardized interface and a connector." As stated above,

Response dated 10/31/2005  
Response to Office Action mailed 06/30/2005

Application No. 09/93 ,545

Rezvani merely discloses a non-pluggable web server which is located at a remote site and can not be inserted into the utility device. Therefore, for at least this reason Applicants respectfully submit that independent claim 6 is in condition for allowance. Dependent claim 12-13 which ultimately depend from independent claim 6 are allowable for at least the same reasons as independent claim 6 from which they ultimately depend.

*Claims 11-13 are rejected under 35 USC 103(a) as being unpatentable over Rezvani, et al., U.S. Publication No. 2003/0140107 as applied to claim 1 [sic claim 10] above; further in view of Rudd, et al., U.S. Patent No. 6,178,468.*

Applicants respectfully submit that dependent claims 11-13 which ultimately depend from independent claims 10 are allowable for at least the same reasons as independent claim 10.

Applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. Should the Examiner believe that a conversation with Applicant's representative would be useful in the prosecution of this case, the Examiner is invited and encouraged to call Applicant's representative.

Respectfully submitted,

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